

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
(Alexandria Division)

ELISA BOSONG KIM)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:22-cv-00427 (PTG/JFA)
)	
AMUSEMENTS OF AMERICA, INC.,)	
)	
Defendant.)	

PLAINTIFF'S RULE 26(a)(3) DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(3), Plaintiff, by counsel, hereby serves her witness and exhibit lists on Defendant. Included are names of witnesses whom Plaintiff expects to call, names of witnesses whose testimony Plaintiff expects to present by video/deposition, and an identification of each exhibit Plaintiff expects to offer.

WITNESSES

Expect to call:

Elisa Bosong Kim
12486 Cavalier Dr.
Woodbridge, VA 22192
(202) 997-2690

Asheesh Gupta, M.D.
Centers for Advanced Orthopaedics
14605 Potomac Branch Dr.
Suite 300
Woodbridge, VA 22191
(703) 490-1112

Eric Kross
205 Marble Run
Williamsburg, VA 23185
(757) 903-5234

Lauren MacDonald
7707 Silo Mill Ct.
Manassas VA 20112
(954) 695-6385

May call if need arises:

Any witnesses identified or called by Defendant and not objected to by Plaintiff.

Expect to present by video/deposition:

Asheesh Gupta, M.D.
Centers for Advanced Orthopaedics
14605 Potomac Branch Dr.
Suite 300
Woodbridge, VA 22191
(703) 490-1112

EXHIBITS

Expect to offer:

- 1-9 Photographs of subject amusement ride taken by Plaintiff on evening of accident
- 10- 17 Photographs of Plaintiff's body taken by Plaintiff on evening of accident
- 18-24 Photographs of amusement ride vehicles found on pages 1, 3, and 4 of Defense expert Hoffman's September 8, 2022 report
- 25 Business card of Kellie House
- 26 The bill for services from Sentara No. Va. Med. Ctr
- 27 The bill for services from Centers for Adv. Ortho/No. Va. Ortho & Spine Care
- 28 The bill for services from PT Solutions
- 29 The bill for services from Potomac View Surgery Center
- 30 The bill for services from Capitol Anesthesia Associates
- 31 Dr. Gupta's curriculum vitae
- 32 The video of Dr. Gupta's testimony
- 33 The transcript of Dr. Gupta's testimony

34 Va. Code § 8.01-419-Table of life expectancy

May offer if the need arises:

Any exhibits identified or offered by Defendant and not objected to by Plaintiff.

ELISA BOSONG KIM
By Counsel

/s/ Craig A. Brown

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 18, 2022, I served a true and accurate copy of the foregoing via electronic mail to:

Jason R. Waters, Esq.
Wilson, Elser, Moskowitz, Edelman & Dicker, LLP
8444 Westpark Drive, Suite 510
McLean, Virginia 22102
jason.waters@wilsonelser.com
Counsel for Defendant

/s/ Craig A. Brown

Craig A. Brown